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HITACHI, LTD., HITACHI DISPLAYS, LTD., and  
HITACHI ELECTRONIC DEVICES (USA), INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: TFT-LCD (FLAT PANEL)  
ANTITRUST LITIGATION

CASE NO. 3:07-md-1827 SI  
MDL NO. 1827

This Document Relates to All Cases

**STIPULATION AND [PROPOSED]  
ORDER MODIFYING DATES OF  
DEPOSITIONS OF ATSUSHIKO  
TOKINOSU, TAKESHI MORI, KENTARO  
ISHIBASHI, KAZUHIRO SAKASHITA,  
AND KAZUAKI KUMAKURA**

Direct Purchaser Class Plaintiffs, Indirect Purchaser Class Plaintiffs, and Direct Action Plaintiffs ("Plaintiffs") and Defendants Hitachi, Ltd., Hitachi Displays, Ltd. and Hitachi Electronic Devices (USA) ("Hitachi Defendants"), parties to the above-entitled action (collectively referred to herein as the "Parties"), hereby stipulate as follows:

**STIPULATION**

WHEREAS, Plaintiffs served notice of the depositions of Atsuhiko Tokinosu scheduled to begin on March 23, 2011, Takeshi Mori scheduled to begin on March 29, 2011, Kentaro Ishibashi scheduled to begin on April 5, 2011, Kazuhiro Sakashita scheduled to begin on April 20, 2011, and Kazuaki Kumakura scheduled to begin on April 26, 2011.

STIPULATION AND [PROPOSED] ORDER MODIFYING DATES OF DEPOSITIONS OF HITACHI WITNESSES  
Case No. 3:07-md-1827 SI

1 WHEREAS, the Parties have met and conferred regarding the schedule of the  
2 aforementioned depositions.

3 WHEREAS, due to the recent natural disaster in Japan, the Parties have mutually agreed  
4 to postpone the aforementioned depositions with the intention to reschedule the depositions to a  
5 later date.

6 NOW, THEREFORE, Parties, through their undersigned respective counsel, stipulate and  
7 request that the Court order as follows:

8 1. That the depositions of Atsuhiko Tokinosu, Takeshi Mori, Kentaro Ishibashi,  
9 Kazuhiro Sakashita, and Kazuaki Kumakura be postponed to a later date to be agreed to by the  
10 Parties; and

11 2. That the class discovery cutoff date of May 11, 2011 be waived for the  
12 aforementioned depositions.

13  
14 DATE: March 17, 2011

MORGAN, LEWIS & BOCKIUS LLP

15 By: /s/ Kent M. Roger

16 Kent M. Roger  
17 One Market, Spear Street Tower  
18 San Francisco, CA 94105-1126  
Tel: 415-442-1000  
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19 *Attorneys for Defendants Hitachi Electronic Devices (USA),*  
20 *Inc., Hitachi, Ltd., and Hitachi Displays, Ltd.*

21 DATE: March 17, 2011

LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP

22 By: /s/ Brendan Glackin

23 Brendan Glackin  
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25 San Francisco, CA 94111-3339  
26 Tel: 415-956-1000  
27 Fax: 415-956-1008

28 *Co-Lead Class Counsel for Direct-Purchaser Plaintiffs*

DATE: March 17, 2011

PEARSON, SIMON, WARSHAW & PENNY, LLP

By: /s/ Bruce L. Simon

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*Co-Lead Class Counsel for Direct-Purchaser Plaintiffs*

DATE: March 17, 2011

ZELLE HOFMANN VOELBEL & MASON LLP

By: /s/ Judith A. Zahid

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*Co-Lead Class Counsel for Indirect-Purchaser Plaintiffs*

DATE: March 17, 2011

THE ALIOTO LAW FIRM

By: /s/ Joseph M. Alioto

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*Co-Lead Class Counsel for Indirect-Purchaser Plaintiffs*

1 DATE: March 17, 2011

ALSTON + BIRD LLP

2 By: /s/ Valarie C. Williams

3 Valarie C. Williams  
4 1201 West Peachtree Street  
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6 Tel: 404-881-7000  
7 Fax: 404-881-7777

*Counsel for Plaintiffs Nokia Corporation and Nokia, Inc.*

8  
9 **SO ORDERED:**



10  
11 Susan Y. Illston  
12 District Court Judge

13 3/18/11

14 Date Entered

15  
16  
17 **ATTESTATION CLAUSE**

18  
19 Pursuant to General Order No. 45, Section X(B) regarding signatures, I, Kent M. Roger,  
20 attest that concurrence in the filing of this document has been obtained from each of the other  
21 signatories.

22  
23 DATED: March 17, 2011

By: /s/ Kent M. Roger

24 Kent M. Roger  
25 *Attorney for Defendants Hitachi Electronic*  
26 *Devices (USA), Inc., Hitachi, Ltd., and Hitachi*  
27 *Displays, Ltd.*